



Headquarters: 120 W. Kansas Avenue / P.O. Box 707 / Ulysses, KS 67880 / (620) 356-3211 / Toll Free 1-800-360-7893 / (620) 356-3242 Fax  
www.westlinkcom.com

VIA ECFS

October 24, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

*Re: Wireless Cost Study WC Docket No. 05-337 and CC Docket No. 96-45*

Dear Ms. Dortch:

On May 1, 2008 the FCC released an Order freezing, by state, the amount of funding that could be obtained by competitive Eligible Telecommunications Carriers ("ETCs"). The Order explained how annual support for competitive ETCs in each state will be capped at the level of support that competitive ETCs in that state were eligible to receive during March 2008, on an annualized basis.

In the Order, an exception was made for competitive ETCs that submit their own costs. More specifically, it is stated in the order that "a competitive ETC will not be subject to the interim cap to the extent that it files cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent LEC."

Attached, please find the WestLink Communications, LLC ("WestLink") wireless cost study including documentation explaining the costing and support calculation processes. This study was prepared using the WIPAN cost methodology and calculates the wireless equivalent of support amounts for High Cost Loop, Local Switching Support and Interstate Common Line Support and meets the requirements contained in the May 1, 2008 Order. The cost methodology and related high cost support calculations are consistent with methods employed for incumbent ILECs.

**Retail Locations**

214 E. Frontview, Suite A Dodge City, KS 67801 (620) 561-5000	2312 E. Kansas, Suite A Garden City, KS 67846 (620) 937-5000	1910 Broadway Great Bend, KS 67530 (620) 868-5000	120 West Kansas Avenue Ulysses, KS 67880 (620) 356-3211	114 E. Sixth Hugoton, KS 67951 (620) 544-4392	201 N. Main St. Lakin, KS 67860 (620) 355-7355
1504 East 17th Hutchinson, KS 67501 (620) 259-5000	4325 Vine, Suite 20 Hays, KS 67801 (785) 365-5000	616 Fort Riley Blvd. Manhattan, KS 66502 (785) 236-5000	110 Chestnut St. Johnson, KS 67855 (620) 492-6234	211 S. Sequoyah Saratoga, KS 67870 (620) 649-2225	411 N. Main St. Scott City, KS 67871 (620) 872-2998
	1642 South Ohio Salina, KS 67401 (785) 721-5000			210 N. Main St. Syracuse, KS 67878 (620) 384-7721	

If you have any questions, please contact me, or Thomas Neal of Fred Williamson and Associates. Thomas can be reached at (918) 298-1618.

Respectfully,

A handwritten signature in black ink that reads "Catherine Veach Moyer". The signature is written in a cursive, flowing style.

Catherine Veach Moyer  
Director, Legal & Regulatory Affairs  
WestLink Communications, LLC  
120 West Kansas Avenue  
Ulysses, Kansas 67880  
620.356.7133 direct phone  
620.424.3133 direct fax  
620.575.5133 wireless  
[catherine@pioncomm.net](mailto:catherine@pioncomm.net)

cc:

Chairman Martin  
Amy Bender, Legal Advisor, Wireline Issues

Commissioner Copps  
Scott M. Deutchman, Competition and Universal Service Legal Advisor

Commissioner Adelstein  
Scott Bergmann, Senior Legal Advisor, Legal Advisor for Wireline Issues

Commissioner Tate  
Greg Orlando, Legal Advisor, Wireline

Commissioner McDowell  
Nicholas G. Alexander, Legal Advisor, Wireline

Wireless Competition Bureau  
Dana R. Shaffer, Bureau Chief